



February 3, 2006

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington DC 20554

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FCC - MAILROOM

RE: **NationsLine Kentucky, Inc**

**RE: Certification of CPNI Filing February 3, 2006, EB Docket No. 06-36; EB-06-TC-060**

Dear Ms. Dortch:

Enclosed please find the original and four (4) copies of the FCC Certification of CPNI Compliance of **NationsLine Kentucky, Inc** filed pursuant to 47 CFR Section §64.2009, and Public Notice DA 06-223. No check is enclosed as no remittance fees are due.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope enclosed for this purpose.

Please address any inquiries or further correspondence regarding this filing to my attention at 540-444-2169.

Sincerely,

Stephen Athanson  
Secretary

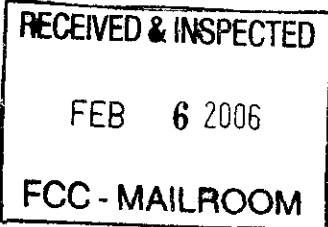
Enclosure

cc: Craig Neeld, Technologies Management  
210 North Park Avenue  
Winter Park, Florida 32789

Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau  
Federal Communications Commission  
Room 4-A234  
445 12<sup>th</sup> St. SW  
Washington DC 20554

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ANNUAL  
OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

I, Stephen Athanson, certify and state that:

1. I am the Secretary of **NationsLine Kentucky, Inc** and have personal knowledge of **NationsLine Kentucky, Inc.'s** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **NationsLine Kentucky, Inc.'s** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining the **NationsLine Kentucky, Inc.'s** operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)

  
\_\_\_\_\_  
Stephen Athanson, Secretary

  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**



Report of NationsLine Kentucky, Inc.  
Regarding CPNI

NationsLine Kentucky, Inc. does not use any agents or third parties to market its telecommunications services. It does utilize its own in house sales force. This sales force would use CPNI information to market offerings within the same service category as service already provided to the customer. This information would be used to provide the customer with premises equipment, voice mail, maintenance and repair service, as well as various vertical features. The company maintains records of all campaigns of this nature. All market campaigns are approved by the company president.

Situations could arise where the company would need to use this information to protect its rights and/or property or to protect its customers from fraudulent, abusive or unlawful use of service.

For the most part company employees are not privy to this sensitive information. The employees that would be privy to it are trained to know when this information can and cannot be used. Violations of this procedure would be handled by verbal warnings for first offenses, written warnings for a second offence and termination if the behavior continued.

Customers are provided with the call details for long distance and any extended area calling on their bills. Any additional requests for this information would be provided by the reprinting and remailing of the bill to the billing address listed on the account. This information is not mailed to an alternate address or provided by any means other than the bill to customers.

The company does receive requests for this type of information as well as local call usage from third parties. This information is distributed to third parties only when a subpoena is submitted to the company. The information is then sent only to the party listed on the subpoena. These subpoenas are kept on file for a period of three years from the date of receipt.